

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
GREENWOOD DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: 8:19-00181
)	
)	
v.)	
)	
)	
DETRIC LEE MCGOWAN, a/k/a, "Fat")	
DONALD NATHANIEL THOMAS, JR.,)	
a/k/a, "TJ")	
JAMAL DEMARCUS LATIMER)	
CHRISTOPHER JEROME)	
CUNNINGHAM)	
RICHARD LAMOND LONGSHORE,)	
a/k/a, "Bam")	
CELEST HENRY BLOCKER)	
EDDIE LEE CHILDS, JR., a/k/a, "Speedy")	
TREVOR MAURICE HULL)	
DANNY MORALES LOPEZ)	
SHEQUITA LATOYA HOLLOWAY)	
LAUREN BROOKE POORE)	
KEVIN O'NEIL WHEELER, aka, "Man")	
VALENCIA DANIELLE SUBER)	

GOVERNMENT'S MOTION FOR RECIPROCAL DISCOVERY

The United States, by and through its undersigned Assistant United States Attorney,
respectfully moves that this Honorable Court direct the Defendant to make available for
inspection and copying each of the following:

A. Pursuant to Fed. R. Crim. P. 26.2 and *United States v. Nobles*, 422 U.S. 225 (1975):

All prior statements in the possession of the Defendant, if any, given by witnesses whom the Defendant expects to call at trial, other than the Defendant himself. The term "statements" is to be construed by the Defendant the same as defined in Fed. R. Crim. P. 26.2 (effective December 1, 1980) and the Jencks Act, 18, U.S.C. §3500.

B. Pursuant to Fed. R. Crim. P. 16(b)(1)(A):

All books, papers, documents, photographs, tangible objects, or copies or portions thereof, which are within the possession, custody, or control of the Defendant and which the Defendant intends to introduce as evidence in chief at trial.

C. Pursuant to Fed. R. Crim. P. 16(b)(1)(B):

Any results or reports of physical or mental examinations and of scientific tests or experiments made in connection with this particular case, or copies thereof, as well as the names and or opinions of any such experts conducting tests or experiments or examinations, within the possession or control of the Defendant, which the Defendant intends to introduce as evidence in chief at the trial or which were prepared by a witness whom the Defendant intends to call at the trial when the results or reports relate to their testimony within twenty (20) days of this notice.

D. Pursuant to FED. R. CRIM. P. 12.1:

Any notices of alibi, to include the specific place or places at which the Defendant claims to have been at the time of the alleged offense(s) and the names and address of the witnesses upon whom the Defendant intends to rely to establish such alibi.

Respectfully submitted,

SHERRI A. LYDON
UNITED STATES ATTORNEY

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